

Exhibit 1

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August 2, 2024

VIA EMAIL

Adam M. Slater, Esq.
Mazie Slater Katz & Freeman, LLC
aslater@mazieslater.com

RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
No. 1:19-md-2875-RBK-KMW (D.N.J.)

Dear Adam:

I am writing to follow up on the discussion at the July 23 conference before Judge Bumb with respect to testimony from current or former employees of the ZHP defendants.

Our understanding is that the following individuals reside within the Court's subpoena power: (1) Hai Wang; (2) John Iozza; (3) Lijie Wang; and (4) Remonda Gergis. To the extent you intend to present testimony from any of these witnesses at trial, please subpoena them through ZHP counsel.

ZHP is undertaking efforts to bring the following witnesses live from China: (1) Min Li; (2) Jucai Ge; (3) Linda Lin; (4) Maggie Kong; and (5) Jinsheng Lin.

We believe that five ZHP company witnesses, each of whom played a different role at the company, are more than enough to present your case. Particularly given Judge Bumb's admonition about cumulative testimony and the Court's strong preference for live witnesses, we do not think deposition designations from additional ZHP witnesses would be appropriate or efficient. If there are narrow designations you wish to discuss, we are available to meet and confer.

Adam Slater, Esq.

August 2, 2024

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Sincerely,

A handwritten signature in cursive script that reads "Jessica Davidson".

Jessica Davidson

cc: Nina Rose